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February 5, 2007

FILED/ACCEPTED

Federal Communications Commission (FCC)
445 12th Street, SW
Systems Engineering Division
Washington, DC 20554

JUN 15 2007

Federal Communications Commission
Office of the Secretary

Attn: Fred Campbell, Chief, Wireless Telecommunications Bureau (WTB)
Julius P. Knapp, Chief, Office of Engineering and Technology (OET)

Re: Type Approval of Class B AIS Equipment

Dear Mr. Campbell,

We hereby request that the FCC approves Class B Automatic Identification System (AIS) equipment as soon as possible, even if it is prior to completion of the rule making process. Class B AIS equipment is valuable for safe navigation and Maritime Domain Awareness (MDA); the sooner these devices are approved and available for installation, the greater the potential for saving lives.

Further, the approval process should follow the Proposed Rules outlined in FCC 06-108: Report and Order and Further Notice of Proposed Rule Making and Fourth Memorandum Opinion and Order, Released on July 24, 2006. The Proposed Rules outlined in FCC 06-108 describe a type approval procedure identical to the Class A AIS type approval procedure (defined in 47 CFR §80.275) except that Class B equipment is required to meet IEC 62287-1, the international Class B AIS standard. Additionally, the equipment must be approved by the United States Coast Guard (USCG) prior to application to the FCC. This process is familiar to all involved and efficient for Class A AIS equipment, so there is no reason to use any other process for Class B AIS equipment.

IEC 62287-1 is the only published Class B AIS standard, so complete compliance to it ensures that equipment will be accepted worldwide. It is imperative that fully-IEC 62287-1 compliant Class B AIS devices be approved by the FCC so that users of the equipment will have worldwide Class B AIS compliance. Further, approvals should be allowed as soon as possible so that the safety and security benefits are realized sooner.

Approval of Class B AIS equipment that complies completely with IEC 62287-1 should not be delayed due to any issues raised in comments to FCC 06-108. One comment proposed not requiring DSC capabilities in the United States and allowing Class B AIS devices that operate only on AIS1. While these options may or may not be viable, approval of Class B AIS equipment that complies completely with IEC 62287-1

No. of Comments 2
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including the DSC capabilities described within the standard, should not be delayed due to discussions on the proposed variants.

ACR Electronics is developing Class B AIS Equipment with the following designation:

- Trade Name: Nauticast-B
- Model: AIS-300
- Proposed FCC ID: B66ACR-AIS-300

This equipment will be manufactured at our Ft. Lauderdale, Florida facility.

ACR will apply to the USCG for approval of the AIS-300 this week and we expect to receive approval soon. We plan to make a formal Application for Equipment Authorization to the FCC as soon as we receive USCG approval.

In summary, we ask that the FCC approves Class B AIS equipment that complies completely to IEC 62287-1 as soon as possible in order to improve navigational safety and MDA. Please contact me if you have any questions or would like to discuss these issues in greater detail. My email address is bfrench@acrelectronics.com and my phone number is 954-862-2135.

Your cooperation is greatly appreciated.

Sincerely,



Bryan French
Technical Compliance Leader